

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA OSTELLA, LISA LIBERI, BRENT LIBERI,
FRANK M. OSTELLA, and PHILIP J. BERG,
ESQUIRE,

Case No.: 2:12-cv-07002-TON

Plaintiffs,

v.

IRBSEARCH, LLC, LEXISNEXIS RISK DATA
MANAGEMENT, INC., f/k/a Seisinet, Inc. d/b/a
Accurint, NEIL SANKEY, TODD SANKEY, THE
SANKEY FIRM, INC., and DOES 1-50,

**PROPOSED DISCOVERY PLAN
PURSUANT TO RULE 26(F)**

Defendants.

The parties jointly submit the following proposed discovery plan to the Court pursuant to Fed. R. Civ. P. 26(f):

1. All parties do not consent to conducting proceedings before a Magistrate Judge, including motions and trial.
2. The case is to be tried by a jury.
3. Initial disclosures, pursuant to Fed. R. Civ. P. 26(a)(1), shall be served by December 2, 2013.
4. Any motion to amend the pleadings and/or join additional parties may be filed by January 31, 2014.
5. All fact discovery is to be completed by April 14, 2014.
6. The parties will converse regarding the possibility of a settlement conference or other alternative dispute resolution at some point before April 14, 2014 and report the results of the conversation to the Court at that time.

7. The following interim fact discovery deadlines may be extended by the parties but shall not extend past April 14, 2014:
 - a. Initial requests for production, including requests for electronic discovery, to be served by January 15, 2014.
 - b. Responses to requests for production, including the production of electronic discovery, to be served within 30 days, in accordance Fed. R. Civ. P. 34.
 - c. Initial interrogatories to be served by January 15, 2014.
 - d. Responses to interrogatories to be served within 30 days, in accordance with Fed. R. Civ. P. 33.
 - e. Depositions to be completed by April 14, 2014.
8. Expert discovery, if any, is to be completed by June 16, 2014.
9. The following interim deadlines for expert discovery, if any, may be extended by the parties but shall not extend past June 16, 2014:
 - a. Plaintiff's expert reports and production of underlying documents, if any, due by May 1, 2013.
 - b. Defendant's expert reports and production of underlying documents, if any, due by May 14, 2014.
 - c. Expert depositions to be completed by June 16, 2014.
10. Motions for Summary Judgment
 - a. Any party(ies) intending to make a Motion for Summary Judgment shall state that intention in writing by June 16, 2014 (or at the end of discovery).
 - b. Motion due within 30 days of end of discovery.
 - c. Opposition due within 21 days of service of Motion.

- d. Reply within 14 days of service of Opposition.
- e. These deadlines shall apply equally to Cross-Motions for Summary Judgment.

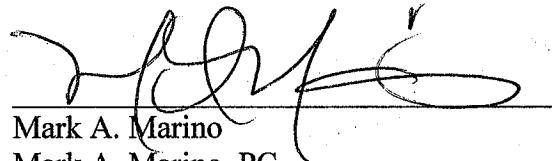
11. Counsel for Plaintiffs will file a final pretrial memorandum, points for charge, any notices pursuant to Fed. R. Evid. 902(11) and (12), and any dispositive motion(s) within 30 days of the end of discovery.

12. Counsel for Defendant will file a final pretrial memorandum, points for charge, any notices pursuant to Fed. R. Evid. 902(11) and (12), and any dispositive motion(s) within 30 days of the end of discovery.

13. The Court will choose a trial date at its discretion.

Dated: New York, New York
November 14, 2013

Respectfully Submitted,



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Attorney for Plaintiffs